

Compliance Assessment Report CAR_NRW0050062

Permit being assessed: CP3795FY.

For: Newport Metal Site, **held by:** Unimetals Recycling (UK) Limited

At: South Dock, Alexandra Dock, Newport, Gwent, NP20 2WE.

Type of assessment: Site Inspection,

Reason: Other.

On: 19/11/2025 between 10:00 and 12:00.

Parts of permit assessed: 2.3 Operating techniques.

NRW Lead Officer: Luke Burton, accompanied by Alexandra Tennant.

Report sent to: Operator in Liquidation, report shared with landowner, on 03/12/2025.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2C - Installations - Operations - Operating techniques	C3 Minor	1.1.1 (a)

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
1	4

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR2C	The operator shall manage all waste in accordance with a written fire prevention plan as per the current, relevant fire prevention and mitigation plan guidance.	15/12/2025

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Introduction

This Compliance Assessment Report (CAR) has been prepared following an inspection of the permitted site. The inspection focused on three key areas of the environmental permit: fire prevention and mitigation measures, waste quantities stored and non-compliances previously identified in CAR_NRW004632.

Regulatory Context

Following the operator's issuance of multiple Notices of Intent to appoint administrators, this inspection was conducted to assess compliance with critical aspects of the environmental permit that pose the greatest risk of pollution should circumstances compromise the operator's ability to maintain the permit.

Findings

1. Fire prevention and mitigation

A partial assessment of aspects of the sites fire prevention and mitigation plan was completed on site.

A number of aspects were found to be compliant with the plan and current fire prevention and mitigation plan guidance, herein after referred to as "the guidance".

The aspects assessed to be compliant were limited to general firefighting access, availability and accessibility of drainage shut-off measures, contingency planning for waste movements and firefighting water provision.

Management of waste was found to be both complaint and not compliant with the guidance. In that a number of waste stack sizes were within the maximum pile sizes and minimum separation distance and some not.

The fridges and polyurethane foam waste piles were observed to be larger than the pile sizes and not arranged using adequate separation distances, required by the guidance.

This represents non-compliance with the environmental permit as the waste pile sizes and separation distances do not comply with those required by the guidance.

The environmental permit does not contain a specific condition pertaining to fire prevention and mitigation plan. However, condition 1.1.1 of the environmental permit states:

1.1.1 The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of

complaints

As a result of this non-compliance category C3 has been recorded against compliance sub-criteria IR1A – General management.

A C3 score has been levied as it is reasonably foreseeable that non-compliance with permit condition 1.1.1 (a) will result in a minor pollution of the environment.

Action: The operator shall manage all waste in accordance with a written fire prevention plan as per the current, relevant fire prevention and mitigation plan guidance.

2. Waste quantities

The following waste quantities were estimated to be on site leading up to and around the time of the inspection according to the operators records. It is anticipated that similar quantities of waste exist on site at present.

- Small mixed WEEE – 54 tonnes
- Ferrous metal – 11,943 tonnes
- Non-ferrous metal – 108 tonnes
- Incinerator fines – 35 tonnes
- Un-depolluted train carriages – 104 tonnes
- Batteries – 12 tonnes
- Polyurethane foam – 466 tonnes
- Fridges – 1644 tonnes

3. Non-compliances previously identified in CAR_NRW004632

The only non-compliances recorded for this permit in 2024 were the reported emissions for quarter one and quarter three for copper at monitoring point TSP2 were outside of specified limits of Table S3.1.

These non-compliances were recorded in CAR_NRW004632 and an action placed on the operator to: submit to Natural Resources Wales a report detailing: all sources of copper on site, copper storage locations and storage methods, site drainage plan, and appropriate control measures they will implement to bring point source water emissions of copper within permitted limits.

The operator complied with the required action, and no further exceedances of emission limits have been reported.

During the inspection, compliance with this action was verified. Specifically, the highest-risk source of copper—incinerator bottom ash scrap and its associated fines—which had not been identified by the operator in the original action, was found to be managed in a manner that prevented any pathway to the drainage system.

In addition, the sampling and monitoring points (TSP1 and TSP2) were inspected and confirmed to have appropriate access for sampling and monitoring activities related to the emission points.

Both sample point chambers were opened with the intention of collecting water quality

evidence samples. However, due to recent dry weather conditions, no flow was present, and therefore no samples could be collected at the time of inspection.

Status of the operator

Since undertaking the inspection the operator [Unimetals Recycling (UK) Limited] has entered into liquidation. Natural Resources Wales have been advised that the liquidators have disclaimed permits EPR/KP3195FW and the land that the company held. In the absence of a permit holder this CAR can not be issued to the operator. This CAR is being shared with the Landowner as the entity responsible for the ongoing security of the site and any pollution incidents that arise from the site

END

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.